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13 *Attorney for Plaintiff, Deutsche Bank National Trust Company, as Trustee, in Trust for The*  
14 *Registered Holders of Morgan Stanley ABS Capital I Inc. Trust 2006-HE7, Mortgage Pass-*  
15 *Through Certificates, Series 2006 HE7*

16 **UNITED STATES DISTRICT COURT**  
17 **DISTRICT OF NEVADA**

18 DEUTSCHE BANK NATIONAL TRUST  
19 COMPANY, AS TRUSTEE, IN TRUST FOR  
20 THE REGISTERED HOLDERS OF  
21 MORGAN STANLEY ABS CAPITAL I INC.  
22 TRUST 2006-HE7, MORTGAGE PASS-  
23 THROUGH CERTIFICATES, SERIES 2006  
24 HE7,

25 Plaintiff,

26 vs.

27 FIDELITY NATIONAL TITLE GROUP,  
28 INC.; FIDELITY NATIONAL TITLE  
INSURANCE COMPANY; DOE  
INDIVIDUALS I through X; and ROE  
CORPORATIONS XI through XX, inclusive,

Defendant.

Case No.: 2:20-cv-01886-GMN-BNW

**STIPULATION TO EXTEND TIME TO  
RESPOND TO MOTION TO DISMISS  
[ECF Nos. 57, 58]**

**(First Request)**

COMES NOW, Plaintiff, Deutsche Bank National Trust Company, as Trustee, in Trust for The Registered Holders of Morgan Stanley ABS Capital I Inc. Trust 2006-HE7, Mortgage Pass-Through Certificates, Series 2006 HE7 (“Deutsche Bank”) and Defendants, Fidelity National Title Group, Inc. and Fidelity National Title Insurance Company (“Defendants”, collectively, the “Parties”), by and through their respective undersigned counsels, stipulate and agree as follows:

- 1 1. On March 12, 2024, Defendants filed their Motion to Dismiss [ECF Nos. 57, 58]<sup>1</sup>;
- 2 2. Deutsche Bank's deadline to respond to Defendants' Motion to Dismiss is currently
- 3 March 26, 2024;
- 4 3. This is one of five cases pending before this Court in which similar Motions to Dismiss
- 5 have been filed and with the same deadline for a response<sup>2</sup>. Good cause exists for a
- 6 brief extension as counsel for Deutsche Bank reasonably requires additional time to
- 7 diligently prepare responses given the numerous Motions to Dismiss due at the same
- 8 time. Deutsche Bank requests a two-week extension up to and including April 9, 2024
- 9 to file its response to Defendants' Motion to Dismiss;
- 10 4. Counsel for Defendants does not oppose the requested extension;
- 11 5. This is the first request for an extension and is made in good faith and not for purposes
- 12 of undue delay or prejudice.

13 **IT IS SO STIPULATED.**

14 DATED this 25<sup>th</sup> day of March, 2024.

DATED this 25<sup>th</sup> day of March, 2024.

15 WRIGHT, FINLAY & ZAK, LLP

SINCLAIR BRAUN KARGER LLP

16 /s/ Yanxiong Li, Esq.

/s/ Kevin S. Sinclair, Esq.

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*Attorneys for Plaintiff*

*Attorneys for Defendants*

21 **IT IS SO ORDERED.**

22 DATED: March 26, 2024

  
DISTRICT COURT JUDGE

24 <sup>1</sup> Defendants inadvertently filed this Motion to Dismiss a second time as ECF 58 and intends to

25 file a stipulated request to strike this duplicative filing.

26 <sup>2</sup> The other four cases being *Wells Fargo Bank, N.A. v. Commonwealth Land Title Insurance*

27 *Company*, Case No. 2:19-cv-00803-GMN-EJY; *U.S. Bank National Association v. Fidelity*

28 *National Title Group, Inc., et al*, Case No. 2:21-cv-01454-GMN-NJK; *U.S. Bank, National*

*Association v. Fidelity National Title Insurance Company*, Case No. 2:19-cv-00809-GMN-BNW;

*Wilmington Trust, National Association v. Commonwealth Land Title Insurance Company*, Case

No. 2:18-cv-02023-GMN-BNW.